

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

COMMONWEALTH OF PUERTO RICO, et al.,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS
(Jointly Administered)

MOTION SUBMITTING CERTIFIED TRANSLATIONS

TO THE HONORABLE COURT:

The Government Development Bank for Puerto Rico (the “GDB”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), through the undersigned attorneys, respectfully state as follows:

1. On August 29, 2018, AAFAF and the GDB filed their *Objection of the Government Development Bank for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority to the Urgent Motion of Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code Sections 105(a) and 362, for Entry of Order Enforcing Automatic Stay and Court’s June 29, 2017 Order Confirming Application of Automatic Stay with Respect to GDB Restructuring* (the “Objection”) [ECF No. 3826].

2. In support of the arguments included in the Objection, AAFAF and GDB cited various cases from the Puerto Rico Supreme Court including: *Rodríguez Román v. Banco Gubernamental de Fomento para Puerto Rico*, 151 D.P.R. 383 (2000), *Commoloco of Caguas*,

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) The Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566) (Last Four Digits of Federal Tax ID: 9686).

Inc. v. Benítez Díaz, 126 D.P.R. 478 (1990) and *Amieiro Gozález v. Pinnacle Real Estata Home Team*, 173 D.P.R. 363 (2008) (jointly, the “Spanish Case Law”).

3. Based on the above, on the same date, AAFAF and GDB sought leave from this Court to submit the Spanish Case Law and requested an extension of seven (7) days to file certified English translations of the Spanish Case Law pursuant to Local District Court Rule 5(g) (the “Motion for Leave”). [ECF No. 3829].

4. On August 30, 2018, this Court granted the Motion for Leave [ECF No. 3835].

5. In compliance with this Court’s order, AAFAF and GDB submit the certified translations of the Spanish Case Law attached to this motion as **Exhibit A**, **Exhibit B** and **Exhibit C**.

WHEREFORE, AAFAF and GDB respectfully request this Honorable Court take notice of the foregoing.

Dated: September 5, 2018
San Juan, Puerto Rico

Respectfully submitted,

/s/ Luis C. Marini-Biaggi
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